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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JAN 04 2022

SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL JAMES ANDERSON and  
CONNOR DUANE GOODMAN,

Defendants.

**4:22-CR-6001-SMJ**

**INDICTMENT**

Vio: 18 U.S.C. § 371

Conspiracy to Make or Possess  
an Unregistered Destructive  
Device  
(Count 1)

26 U.S.C. §§ 5841, 5845(a)(8),  
5861(d), 5871  
Possession of an Unregistered  
Destructive Device  
(Count 2)

26 U.S.C. § 5872, 28 U.S.C.  
§ 2461, 49 U.S.C. § 80303  
Forfeiture Allegations

1 The Grand Jury charges:

2  
3 COUNT 1

4 GENERAL ALLEGATIONS

5 1. At all times relevant to this Indictment, the Defendants, DANIEL  
6 JAMES ANDERSON (“ANDERSON”) and CONNOR DUANE GOODMAN  
7 (“GOODMAN”), were members of a self-described anti-government/anti-authority  
8 group called “the Verified Bois.”  
9

10  
11 2. At all times relevant to this Indictment, ANDERSON resided in  
12 Kennewick, Washington, within the Eastern District of Washington.  
13

14 3. At all times relevant to this Indictment, GOODMAN, resided in  
15 Auburn, Washington, within the Western District of Washington.  
16

17 4. At all times relevant to this Indictment, neither ANDERSON nor  
18 GOODMAN had any firearms or explosive devices registered in their names in the  
19 National Firearms Registration and Transfer Record.  
20

21 5. The Verified Bois regularly conducted training events, during which  
22 members of the group practiced small unit tactics, raids, firearms handling and  
23 manipulation, and survival skills.  
24

25 6. At least one of these training events occurred within the Eastern  
26 District of Washington.  
27  
28

1           7.     Beginning on a date unknown, but by on or about June 1, 2021, and  
2 continuing until on or about December 16, 2021, in the Eastern District of  
3 Washington and elsewhere, ANDERSON and GOODMAN did willfully conspire  
4 and agree with each other and others, both known and unknown to the Grand Jury,  
5 to knowingly make and possess a destructive device, as that term is defined in 26  
6 U.S.C. § 5845(a)(8), which was not registered to either of them in the National  
7 Firearms Registration and Transfer Record, all in violation of 26 U.S.C. §§ 5822,  
8 5841, 5845(a)(8), 5861(c), (d), and (f).  
9

12                               THE UNLAWFUL OBJECT  
13                               AND MANNER AND MEANS OF THE CONSPIRACY  
14

15           8.     It was the overall object and plan of the conspiracy to construct a  
16 destructive device for possible future use in attacking law enforcement officers.  
17

18           9.     Members of the Verified Bois, including ANDERSON and  
19 GOODMAN, frequently discussed their willingness to use force against members  
20 of groups whom they perceived to engage in over-aggressive law enforcement  
21 action.  
22

23                               OVERT ACTS  
24

25           10.    In furtherance of the conspiracy and to accomplish its objectives,  
26 ANDERSON, GOODMAN, and other co-conspirators committed the following  
27 overt acts, among others, some of which occurred within the Eastern District of  
28 Washington:

1           a.     In May 2021, during a Verified Bois meeting, GOODMAN  
2 discussed loading a vehicle with Tannerite, a binary explosive that is commercially  
3 available for target-shooting purposes, which would turn the vehicle into a vehicle-  
4 born improvised explosive device.  
5

6           b.     On or about June 1, 2021, ANDERSON used an online social  
7 media platform to request that members of the Verified Bois provide him with  
8 flash powder or fireworks containing magnesium and phosphorus so that he could  
9 construct an improvised explosive device.  
10

11           c.     Between on or about June 1, 2021 and on or about June 26,  
12 2021, in response to ANDERSON's request, GOODMAN obtained fireworks from  
13 a tribal reservation located in the Western District of Washington and arranged to  
14 transport the fireworks to ANDERSON in the Eastern District of Washington. The  
15 fireworks obtained by GOODMAN consisted of a package containing five (5)  
16 Thundercracker KK0033 fireworks, UN0336 1.4G. A label affixed to each  
17 firework indicated the presence of explosives. The packaging indicated that the  
18 fireworks were manufactured in China, a foreign nation.  
19

20           d.     On or about June 26, 2021, in the <sup>Eastern</sup> ~~Western~~ District of <sup>pmc 1/4/2022</sup>  
21 Washington, GOODMAN delivered the fireworks to a confidential source ("CS"), <sup>for 11/4/2022</sup>  
22 who then delivered the fireworks to ANDERSON at the behest of GOODMAN.  
23  
24 The exchange of the fireworks between ANDERSON and the CS occurred at  
25  
26  
27  
28

1 ANDERSON's residence in the Eastern District of Washington on or about June  
2 29, 2021.

3  
4 e. During this exchange, ANDERSON informed the CS that his  
5 intent was to use the contents of the fireworks to construct improvised explosive  
6 devices. Specifically, ANDERSON told the CS that he would be constructing  
7 improvised explosive devices that would include ball bearings as shrapnel and the  
8 explosive material from the fireworks.  
9

10  
11 f. During this same exchange when speaking to the CS,  
12 ANDERSON also described hand-held explosive devices that could be used at  
13 protests or thrown over the front line of law enforcement officers and explode  
14 behind them.  
15

16  
17 g. In July 2021, ANDERSON informed the CS that he was having  
18 difficulty with the construction of one of his explosive device designs, which he  
19 was constructing. ANDERSON told the CS that the ball bearings did not properly  
20 adhere to the sides of the device.  
21

22  
23 h. In August 2021, ANDERSON told the CS that he had recently  
24 tested three types of explosive devices that he had constructed. ANDERSON told  
25 the CS that two of the three devices performed as designed.  
26

27 i. In September 2021, on an online social media platform,  
28 ANDERSON described his devices as "distraction devices" before stating the

1 following: “[the devices] aren’t training tools. I wouldn’t be anywhere near this  
2 thing. It’s going to throw shrapnel like a MF.” ANDERSON further stated that he  
3 had produced multiple versions of a device.  
4

5 j. In October 2021, ANDERSON, at his residence in the Eastern  
6 District of Washington, showed the CS an example of an improvised explosive  
7 device that he had designed, and explained how he had constructed the device.  
8 The device consisted of a glass mason jar, filled with paper wadding, with shotgun  
9 pellets affixed to the wadding, an explosive charge wrapped in black tape, a fuse,  
10 and a reinforced cap.  
11  
12

13 k. In December 2021, GOODMAN informed the CS that the  
14 fireworks that GOODMAN had provided to the CS to deliver to ANDERSON  
15 were for the purpose of ANDERSON developing an improvised explosive device.  
16  
17

18 l. In December 2021, GOODMAN agreed to sell the CS similar  
19 fireworks, so the CS could construct improvised explosive devices similar to those  
20 designed by ANDERSON.  
21

22 m. In December 2021, ANDERSON and GOODMAN attended a  
23 multi-day meeting at which the CS was also present. This meeting took place in the  
24 Eastern District of Washington. During this meeting, GOODMAN sold the CS  
25 twelve (12) mortar-style fireworks, so that the CS could construct improvised  
26 explosive devices.  
27  
28

PRC  
1/4/2022  
PMC  
1/4/2022

1 n. During this same multi-day meeting in the Eastern District of  
2 Washington, ANDERSON informed the CS how to manipulate the fireworks to  
3 extract the compounds necessary to construct improvised explosive devices.  
4 All in violation of 18 U.S.C. § 371.  
5

6  
7 COUNT 2

8 On or about December 16, 2021, in the Eastern District of Washington, the  
9 Defendant, DANIEL JAMES ANDERSON, did knowingly possess a firearm that  
10 was not registered to him in the National Firearms Registration and Transfer  
11 Record, to wit: an improvised explosive device consisting of a small glass jar  
12 containing wadding, shrapnel, an explosive charge, and a fuse, in violation of 26  
13 U.S.C. §§ 5841, 5845(a)(8), 5861(d), 5871.  
14  
15

16  
17 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

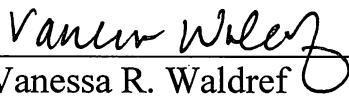
18 The allegations contained in this Indictment are hereby realleged and  
19 incorporated by reference for the purpose of alleging forfeitures.  
20

21 Pursuant to 26 U.S.C. § 5872, 28 U.S.C. § 2461, and 49 U.S.C. § 80303,  
22 upon conviction of an offense in violation of 26 U.S.C. §§ 5845, 5861(d), 5871, as  
23 set forth in this Indictment, the Defendant, DANIEL JAMES ANDERSON, shall  
24 forfeit to the United States of America any property involved or used in the  
25 commission of the offense, including, but not limited to, the following:  
26  
27  
28

1 an improvised explosive device consisting of a small glass jar containing wadding,  
2 shrapnel, an explosive charge, and a fuse.

3  
4 DATED this 4 day of January 2022.

5  
6  
7 A TRUE BILL  
8  
9  
10

11  
12   
13 Vanessa R. Waldref  
14 United States Attorney

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16 Patrick J. Cashman  
17 Assistant United States Attorney  
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# UNITED STATES DISTRICT COURT

for the

Eastern District of Washington

United States of America

v.

CONNOR DUANE GOODMAN

Case No. 4:22-CR-6001-SMJ-2

Defendant

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) CONNOR DUANE GOODMAN,  
who is accused of an offense or violation based on the following document filed with the court:

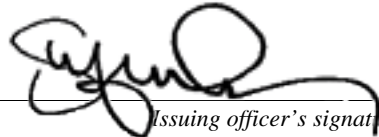
☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint  
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 371 Conspiracy to Make or Possess an Unregistered Destructive Device

Date: Jan 04, 2022, 11:25 am

City and state: Yakima, Washington

  
Issuing officer's signature



Sean F. McAvoy, Clerk of Court/DCE

Printed name and title

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title